

## **U.S.** Department of Justice

United States Attorney Southern District of New York

The Silvio J. Mollo Building One Saint Andrew's Plaza New York, New York 10007

April 12, 2016

## **BY ECF**

Hon. Kimba Wood United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

Re: United States v. Daile Ferguson, 16-cr-131 (KMW)

Dear Judge Wood:

The Parties jointly request an adjournment of the conference date set for April 14, 2016 for approximately 30 days in light of the parties' active negotiations regarding a potential disposition. We understand that Your Honor is available on Wednesday, May 18, 2016 at 2:15 p.m., which is a date and time that both Parties are available. So that the parties can continue plea negotiations, we request that the time until the next court date, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, because it will allow the government and defense counsel to continue discussions regarding a possible disposition. This is the first request for an adjournment, and the defendant is currently on bail.

Respectfully submitted,

PREET BHARARA United States Attorney

By: /s/

Eli J. Mark Assistant United States Attorney (212) 637-2431

cc: Anthony Strazza, Esq. (via email)
Counsel for Daile Ferguson